

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

BRIAN ANTHONY REO,)	CASE NO. 1:22-cv-00510-JG
)	
Plaintiff,)	JUDGE: JAMES S. GWIN
v.)	
)	
LUDIVINE JOAN CLAUDIA)	<u>DEFENDANT, LUDIVINE</u>
REYNAUD, <i>et al.</i>)	<u>REYNAUD'S, MOTION FOR</u>
)	<u>LEAVE TO PLEAD</u>
Defendant.)	

Defendant, Ludivine Joan Claudia Reynaud, hereby requests an additional twenty-one (21) days in which to move, plead, or otherwise respond to the Complaint in the above-captioned case. Pursuant to Fed.R.Civ.P. 12(a)(1)(A)(i), the current answer date is May 25, 2022. If granted, this motion will extend Ms. Reynaud's response date to June 20, 2022.

Undersigned counsel was only recently retained by Ms. Reynaud. The extension will provide counsel with time needed to investigate the facts, confer with Ms. Reynaud, and to plead accordingly. Ms. Reynaud's request for extension of time is the first such request.

Counsel discussed this Motion for Leave with Attorney Bryan Anthony Reo via telephone on May 23, 2022. Attorney Reo indicated that he could not consent to the time extension.

This Motion is submitted in good faith and not for purposes of delay.

Respectfully submitted,

/s/ Madilyn M. Bell

Max E. Dehn (0079600)

Madilyn M. Bell (0098386)

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CERTIFICATE OF SERVICE

A copy of the foregoing was filed electronically on this 23rd day of May, 2022.

Notice of this filing will be sent by the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Madilyn M. Bell

Madilyn M. Bell (0098386)

Attorney for Defendant, Ludivine Reynaud